

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY  
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P.O. Box 45029  
Newark, NJ 07101  
Attorney for Defendants,  
Gurbir S. Grewal, and Patrick J. Callahan

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

FEDERAL LAW ENFORCEMENT  
OFFICERS ASSOCIATION, NEW  
JERSEY FRATERNAL ORDER OF  
POLICE, RICHARD BOWEN, JOSEPH  
JAKUBIEC, and CHRISTOPHER  
MARTINEZ,

Plaintiffs,

v.

GURBIR GREWAL, in his official  
capacity as Attorney General of the State  
of New Jersey, and PATRICK J.  
CALLAHAN, in his official capacity as  
Superintendent of the New Jersey State  
Police,

Defendants.

Hon. Michael A. Shipp, U.S.D.J.  
Hon. Tonianne J. Bongiovanni, U.S.M.J.

Docket No. 3:20-cv-05762-MAS-TJB

**CIVIL ACTION**

**NOTICE OF MOTION  
TO DISMISS PURSUANT TO  
FED. R. CIV. P. 12(b)(6)**

**(ELECTRONICALLY FILED)**

To: United States District Court  
District of NJ – Trenton Vicinage  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Blair A. Gerold, Esq.  
Blank Rome LLP  
1 Logan Square  
Philadelphia, PA 19103

Michael Ray Darbee, Esq.  
Nicholas C. Harbist, Esq.  
Stephen M. Orlofsky, Esq.  
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300 Carnegie Center, Suite 220  
Princeton, NJ 08540

**PLEASE TAKE NOTICE** that on **September 8, 2020**, or as soon thereafter as counsel may be heard, the undersigned attorney for the Defendants, Gurbir S. Grewal and Patrick J. Callahan, will move before the Honorable Michael A. Shipp, U.S.D.J., for an Order dismissing all claims against these Defendants pursuant to Fed. R. Civ. P. 12(b)(6);

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely upon the attached brief in support of the motion.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Fed. R. Civ. P. 78, oral argument is not requested.

A proposed form of Order is attached.

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Bryan Edward Lucas  
Bryan Edward Lucas  
Deputy Attorney General

DATE: July 27, 2020